REMARKS

The Office Action mailed 11 December 2007 has been received and reviewed. Each of claims 2-18 and 21 stands rejected. Claims 2, 3, 4, and 21 have been amended herein. Reconsideration of the above-identified application in view of the above amendments and the following remarks is respectfully requested.

Substance of Interview

Applicant thanks examiner Nguyen for granting the interview on 04 April 2008, and for considering the remarks regarding independent claims (2, 3, 4-5, and 21) and the arguments regarding the deficiencies of the prior art, including Price, Hsu, and Fogg. During the interview, examiner Nguyen noted that the claims may be subject to a restriction and indicated that claims 5-18 and claims that are related to claims 5-18 should be presented to further a focused prosecution of this patent application.

Rejections based on 35 U.S.C. § 101

Claims 2, 3, and 21 are rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claims 2, 3, and 21 are amended to clarify that the computer user interface is generated by instructions executed on computer-readable media or computer systems having processors and memories. Computer-readable media and computer systems configured to execute instructions are statutory subject matter. MPEP §2106.01 Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §101 rejection of claims 2, 3, and 21.

Rejections based on 35 U.S.C. § 112

Claim 4 is rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant amends claim 4 to remove "linked-to," which remedies the lack of antecedent basis. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §112 rejection.

Rejections based on 35 U.S.C. § 102

A.) Applicable Authority

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdeggal Brothers v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). *See also*, MPEP § 2131.

B.) Anticipation Rejection Based on US Patent No. 6,766,494 ("Price").

Claims 2, 3, 5, 14-16, and 21 stand rejected under 35 U.S.C. 102(e) as being anticipated by Price. As Price fails to describe, either expressly or inherently, each element recited in amended independent claims: 2, 3, and 21; and independent claim 5, Applicant respectfully traverses this rejection.

Amended independent claims 2 defines a computer system having processors and memories configured to execute instructions for generating a computer user interface. The user interface comprises a plurality of document pages, where at least two of the document pages includes links. The documents pages may include both user interface document pages and user

content document pages. One of the links specifies a property that indicates a display format for the link. The display format of the link is determined by examination of the content of a target document associated with the link. The target document differs from the document containing the link. Furthermore, a viewing frame displays both user interface document pages and user content document pages, provides modeless navigation between the plurality of document pages without changing focus, and generates a unified non-linear navigation history for the modeless navigation.

Amended independent claim 2 requires, among other things, "the display format of the link is based upon an examination of the content of a target document associated with the link and the target document differs from document containing the link." Applicant respectfully submits that the prior art, including Price, fails to anticipate each required element of amended independent claim 2.

The Office contends that Price, at col. 6, ll. 3-col. 7, ll. 23, anticipates the examination of the target document to determine display format. The cited portions of Price describe creating strokes that are anchors in a document, storing the strokes and anchors in a database, and retrieving the contextual information associated with the anchor when the user enters a stroke pattern that matches the stored strokes. In Price, the document containing the anchor and the target document are the same document. Price fails to describe a display format of a that is link based on examination of the target document, which differs from the document containing the anchor.

Unlike Price, the invention of amended independent claim 2 requires, among other things, a display format of one link is based upon an examination of content of a target document associated with the link, where the target document differs from document containing the link. Applicant respectfully submits, Price fails to describe the invention of amended

independent claim 2. Accordingly, for at least the above reason, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection and allowance of amended independent claim 2.

Amended independent claims 3 defines a computer-readable media storing instructions for generating a computer user interface. The computer user interface includes a plurality of document pages and at least two of the document pages include links. One of the links having a property that indicates a display format for the link and another property indicating the display update latency for content corresponding to the link.

Amended independent claim 3 requires, among other things, "the links having a property that indicates a display format for the link, wherein the link has another property indicating the display update latency of content corresponding to the link." Applicant respectfully submits that the prior art, including Price, fails to describe each required element of amended independent claim 3.

The Office contends that Price, at col. 7, l. 34-col. 8, l. 11, anticipates the display update latency property of the link. The cited portions of Price describe deleting strokes and anchors in a document. In Price, the update latency does not correspond to updates of the target document referred to by the link. Price fails to fairly describe a link property that specifies the update latency of the target document.

Unlike Price, the invention of amended independent claim 3 requires, among other things, links having a property that indicates a display format for the link, wherein the link has another property indicating the display update latency of content corresponding to the link. Applicant respectfully submits, Price fails to describe the invention of amended independent claim 3. Accordingly, for at least the above reason, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection and allowance of amended independent claim 3.

Independent claim 5 recites a computer readable medium having computer executable instructions. The executable instructions provide a plurality of user interface document pages to a user, where at least one of the user interface document pages includes a first link. Additionally, a plurality of user content document pages are provided to a user and at least one of the user content document pages includes a second link. Moreover, at least one link property indicates a display format for at least one of the first and second links.

Independent claim 5 requires, among other things, "indication via at least one link property a display format for at least one of the first and second links." Applicant respectfully submits that the prior art, including Price, fails to describe each required element of independent claim 5.

The Office contends that Price, at col. 10, ll. 6-22, anticipates the display property that indicates the display format for the at least the first link and the second link. The cited portions of Price describe links that are formatted based on whether the windows or pages are visible. In Price, the format of the links does not correspond to a property corresponding to the link. Price fails to fairly describe a link property that specifies the display format for the link.

Unlike Price, the invention of independent claim 5 requires, among other things, links having a property that indicates a display format for the link. Applicant respectfully submits, Price fails to describe or suggest the invention of independent claim 5. Accordingly, for at least the above reason, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection and allowance of independent claim 5.

Dependent claims 6-18 further define novel features of the invention of independent claim 5 and each depend, either directly or indirectly, from independent claim 5. Accordingly, for at least the reasons set forth above with respect to independent claim 5, dependent claims 6-18 are believed to be in condition for allowance by virtue of their

dependency. See 37 C.F.R. §1.75(c). As such, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection and allowance of dependent 6-18.

Amended independent claim 21 recites a computer-readable medium storing instructions for generating a computer user interface. The computer user interface includes a plurality of document pages, where at least two of the document pages have links. One of the links having a property that indicates a display format for the link, which relates an executable object with a spot in the document page having the link.

Amended independent claim 21 requires, among other things, "a property for a link that indicates the display format for the link and an executable object that corresponds with the link." Applicant respectfully submits that the prior art, including Price, fails to teach or suggest each required element of amended independent claim 21.

The Office contends that Price, at col. 10, ll. 6-22, anticipates the display property that indicates the display format for the link corresponding to an executable object. Also, the Office contends that Price, at col. 3, ll. 35-43 and col. 5, ll. 3-439, teaches the executable object. The cited portions of Price describe links that are formatted based on whether the windows or pages are visible and creating anchors for locations within a document. In Price, the format of the links does not correspond to a property corresponding to the link. Price fails to fairly describe a link property that specifies the display format for the link or an executable object associated with the link.

Unlike Price, the invention of amended independent claim 21 requires, among other things, an executable object corresponding with links having a property that indicates a display format for the link. Applicant respectfully submits, Price fails to describe the invention of amended independent claim 21. Accordingly, for at least the above reason, Applicant

respectfully requests withdrawal of the 35 U.S.C. §102(e) rejection and allowance of amended independent claim 21.

Rejections based on 35 U.S.C. §103

A.) Applicable Authority

Title 35 U.S.C. §103(a) declares, a patent shall not issue when "the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." The Supreme Court in *Graham v. John Deere* counseled that an obviousness determination is made by identifying: the scope and content of the prior art; the level of ordinary skill in the prior art; the differences between the claimed invention and prior art references; and secondary considerations. *Graham v. John Deere Co.*, 383 U.S. 1 (1966). To support a finding of obviousness, the initial burden is on the Office to apply the framework outlined in *Graham* and to provide some reason, or suggestions or motivations found either in the prior art references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the prior art reference or to combine prior art reference teachings to produce the claimed invention. See *Application of Bergel,* 292 F. 2d 955, 956-957 (CCPA 1961). Recently, the Supreme Court elaborated, at pages 13-14 of the *KSR* opinion, it will be necessary for [the Office] to look at interrelated teachings of multiple [prior art references]; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by [one of] ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the [patent application]." *KSR v. Teleflex*, No. 04-1350, 550 U.S. ___ (2007).

B.) Obviousness Rejections Based on US Patent No. 6,766,494 ("Price") in view of US Patent No. 6,549,220 ("Hsu").

Claims 4, 6-13, and 17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Price et al. in view of Hsu. Applicant respectfully traverses this rejection because the prior art, including Price and Hsu, fails to teach or suggest all elements of the inventions of amended independent claim 4 and independent claim 5.

Amended independent claim 4 defines a computer readable medium having computer-executable instructions for navigating to a document page and displaying the document page in a first display format, in response to activation of a first link by a user. Furthermore, in response to activation of a second link by a user, the second link being different than the first link and linking to the same document page linked to by the first link, navigating to the document page and displaying the document page in a second display format, the second display format being different than the first display format. The first display format depends upon at least one property of the first link and the second display format depends upon at least one property of the second link.

Amended independent claim 4 requires, among other things, "the second link being different than the first link and linking to the same document page linked to by the first link, navigating to the document page and displaying the document page in a second display format, the second display format being different than the first display format." Applicant respectfully submits that the prior art, including Price, fails to describe each required element of amended independent claim 4.

The Office concedes that Price fails to describe displaying the same document in first or second display format based on the link activated. The Office relies on Hsu to remedy the deficiencies of Price. Hsu, at col. 5, l. 7-col. 6, l.48, describes links that load pages with

navigations areas that are formatted differently. Contrary to the Office's allegations, Hsu fails to teach or suggest the same page is formatted differently, the first link and second link are associated with the same page, and properties of the first link and properties of the second link control the display format of the page. Accordingly, Hsu fails to remedy the deficiency of Price.

Unlike Price and Hsu, alone and in combination, the invention of amended independent claim 4 requires, among other things, a second link being different than a first link and linking to the same document page linked to by the first link, navigating to the document page and displaying the document page in a second display format, the second display format being different than the first display format. Applicant respectfully submits, Price and Hsu fail to teach or suggest the invention of amended independent claim 4. Accordingly, for at least the above reason, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection and allowance of amended independent claim 4.

Dependent claims 6-13 and 17 depend from independent claim 5. As discussed above, Price fails to teach or suggest all the elements of independent claim 5. Accordingly, claims 6-13 and 17 are patentable over Price for at least the above-cited reasons. The addition of Hsu fails to cure the deficiencies of Price with respect to the elements of independent claim 5. As such, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection and allowance of dependent claims 6-13 and 17.

C.) Obviousness Rejections Based on US Patent No. 6,766,494 ("Price") in view of US Patent No. 6,321,242 ("Fogg").

Claim 18 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Price in view of Fogg. Applicant respectfully traverses this rejection because the prior art, including Price and Fogg, fails to teach or suggest all elements of the inventions of independent claim 5.

Dependent claims 18 depend from independent claim 5. As discussed above, Price fails to teach or suggest all the elements of independent claim 5. Accordingly, claims 18 is patentable over Price for at least the above-cited reasons. The addition of Fogg fails to cure the deficiencies of Price with respect to the elements of independent claim 5. As such, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection and allowance of dependent claims 18.

CONCLUSION

For at least the reasons stated above, claims 2-18 and 21 are now in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and allowance of the claims. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned to resolve the same. The Commissioner is hereby authorized to charge any additional amount required or credit any overpayment to Deposit Account No. 19-2112.

Respectfully submitted,

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